Hunters Point Briefing for Enrique
Suggested Agenda - May 1, 2019

1. Updates
    a. EPA technical detail comments submitted April 25, 2019
        i. Parcel G draft final Work Plan (dated November 2, 2018), to be incorporated into revised Work Plan
        ii. Draft PRG Calculations (dated Nov/Dec, 2018), to be incorporated into the Five-Year Review as a Technical Memorandum

    b. Navy Parcel G Soil Addendum sent April 17, 2019, requested comments May 31, Check-in Call May 1
        i. Missing details
        ii. Soil Sorter – conveyor belt
        iii. Air/Dust management

    c. Five-Year Review
        i. Timing proposal
        ii. RESRAD, see website posting

2. May 2 call with Laura Duchnak
    a. Confirmed participants include Grant Cope, Mark Malinowski, Mark Starr
    b. Draft talking points (see attached)

3. Next Steps
    a. Navy - Soil Reference Background, to be incorporated into revised Parcel G Work Plan
        i. Details from Navy regarding Sampling and Analysis Plan
        ii. Written confirmation regarding soil reference background locations

    b. EPA comments on Parcel G Addendum, aiming for May 21

    c. Navy PRG Calculator Assessments, part of our requested technical memorandum for the Five-Year Reviw

Call with Navy (Laura Duchnak) May 2, 2019, 1:30 pm
Room-9311-10-Yerington, Conference Call 628-246-1294, code 5345295
Draft Talking Points

- Thank you for meeting April 15 to discuss our proposed path forward outlined in my April 11 letter.

UPDATES:

- My staff sent you technical detail comments on the Parcel G draft final Work Plan and the Five-Year Review. I understand you saw no surprises and we are discussing a few minor clarifications.

- We listed the final items that we are waiting for before considering approval for soil reference background testing. These include details about the sampling and analysis plan and written confirmation of several verbal discussions. These can be provided separately from the other documents that are still in progress, e.g. the Five-Year Review technical memorandum and the Addendum for work within Parcel G.

- Thank you for sending a draft Parcel G Work Plan Addendum, which my staff are reviewing. Thank you also for the demonstration of the soil sorter and the informal call among staff earlier this week. These were helpful opportunity to identify issues for further discussion. These include details about the soil sorter scan sensitivity and speed as well as the dust management plan.

PATH FORWARD:

- You said on April 15 that your team would need internal discussion of our proposed path forward before agreeing to it. I am interested to hear where you stand now after reflecting for two weeks and after receiving our final technical detail comments.

- I understand you may want to move forward with presenting RESRAD and PRG Calculator assessments. We recommended against that due to the time it would take to go through the Headquarters consultation process. We cannot commit to reviewing and approving RESRAD assessments without delays.

- We have made arrangements for a briefing to Congressional staff tomorrow about our April 11 letter. You are welcome to join. Our staff have already invited your staff.

Excerpts from April 25, 2019, EPA Technical Detail Comments regarding Soil Reference Background Testing

'6. Chapter 3, Soil Investigation Design and Implementation, and Appendix C, Soil Reference Background Area Work Plan: We understood that at the time of the draft final Work Plan, some details were not ready for inclusion and would be provided later. As discussed on a conference call in November, 2018, below is a more detailed list of what we need from the Navy prior to finalizing the soil reference background study. The draft final only provided example instruments and example MDC calculations. We need the final versions. Please note that we have not completed review of the *Addendum* that arrived April 17, 2019, and we understand that some of this information may be contained in that document.

a. Gamma Scan and Static Surveys, including of the background reference areas:

- **i.** Identify the Contractor that will be conducting field investigation/radiological surveys and data collection and submit contractor-specific standard operating procedures (SOPs) for field investigation, including SOPs for all radiological surveys.
- **ii.** Provide calculations documenting how the minimum detectable counts (MDCs) listed in Parcel G Work Plan Table 3-7 (A Priori Scan MDCs) for gamma walk-over surveys using the RS-700 instrument were determined. For example, Section 3.5.2.2 (Gamma Scan Minimum Detectable Concentration) provides example calculations for the Model 44-20 (3-inch by 3-inch) Sodium Iodide (NaI) detectors, but it does not provide information about the RS-700 system. Note that CDPH provided a technical basis document for documenting how the RS-700 system was calibrated for the gamma scans conducted at Parcel A-1 using the MicroShield modeling program. Such information should be included in the Parcel G Work Plan, as follows:
  - **i.** Modeling used to correlate gamma fluence rates to detector performance/efficiency
  - **ii.** Efficiency of detectors using calibration sources
  - **iii.** Detection limits for identification of discrete sources versus soil contamination
- **iii.** Copy of nuclide library including the energy lines that will be used for quantitation of individual radionuclides
- **iv.** Identify the size of the detectors used for the RS-700 system, the mounting configuration, and information demonstrating how 100% of the land areas scanned will be covered by the RS-700 gamma scan instruments based on the size and mounting configuration.
- **v.** Specify that global positioning system (GPS)/positional data collection will occur during the RS-700 system scanning surveys.
- **vi.** Provide a listing of the static measurement MDCs for the Ludlum 2221 with Model 44-20 NaI detectors and the RS-700 system. Example scanning MDCs were provided in Table 3-7 (A Priori Scan MDCs) but MDCs for statics were not provided. Please note that the soil reference background area work plan calls for 25 samples per reference background area. The laboratory can reliably test to Minimum Detectable Concentrations (MDCs) that are below the ROD RGs. Per MARSSIM, a background reference area is, by definition, a non-impacted area. Therefore a background reference area does not need to be scanned. However, scanning is a wise additional

optional precautionary step that can help identify potential signs of contamination. At the stated scan MDC, gamma emitting radiological objects can be detected.

vii. Include a listing of instruments, calibration and MDCs (if different) for gamma scanning of core samples since this may present a different geometry than scanning excavated soils and different detectors may be used.

b. Investigation parameters

i. Revise the Work Plan to include the listing of all radionuclides of concern (ROCs) for some survey units/trench units and buildings based on the Historical Radiological Assessment, Volume II (HRA) per previous comment submittals.

'10. Appendix C, Section 3.1.3 Reference Area Background Locations. The off-site Background Reference Area (BRA) is likely to be moved to another less disturbed site. During the February 11, 2019, site walk it was agreed that this change could be made after the Work Plan Appendix C is finalized using the Field Change Request (FCR) process and that this FCR would be submitted to the Regulatory Agencies before sampling of this area is conducted so that Regulatory Agency representatives can be present to observe and collect split samples. Split samples will be collected from approximately 10% of the locations. Also, as discussed during the site walk, it was agreed that the off-site BRA would not be located at or near the bottom of a slope where fallout radionuclides could have been concentrated in run-off and that it would be located in an area that had been undisturbed since the 1940s, based on aerial photograph review and discussion with people familiar with the history of the site. Finally, it is unclear if a second off-site BRA would be selected, as that was discussed during the site walk. Please ensure that the off-site BRA(s) is/are not located at the bottom of a slope and is/in a relatively undisturbed area. Please also ensure that any FCR changing the off-site BRA location is submitted prior to collection of samples at the BRA and that the Regulatory Agencies are notified in time to allow scheduling an observer who will collect split samples. In addition, please ensure that the Work Plan is revised to include detailed procedures for split sampling. Finally, please consider selecting a second off-site BRA.

'11. **Appendix C, Section 3.1.3 Reference Area Background Locations.** Please revise the Work Plan to state that if elevated radiological contamination or a radiological object are found during the sampling or gamma scans of a BRA or during sampling, or if any BRA shows any other signs that it is contaminated, then an alternate BRA will be selected.

'12. Appendix C, Section 4.1, Gamma Scan Data Evaluation. The soil reference background area work plan calls for 25 samples per reference background area. The laboratory can reliably test to Minimum Detectable Concentrations (MDCs) that are below the ROD RGs. Per MARSSIM, a background reference area is, by definition, a non-impacted area. Therefore a background reference area does not need to be scanned. However, scanning is a wise additional optional precautionary step that can help identify potential signs of contamination. At the stated scan MDC, gamma emitting radiological objects can be detected.